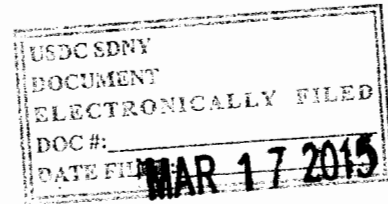


certified J

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**



-----X
THE UNITED STATES DEPARTMENT
OF THE TREASURY,

Plaintiff,

14 Civ. 9987

v.

THOMAS E. HAIDER,

Defendant.
-----X

STIPULATION AND ORDER TO TRANSFER VENUE

WHEREAS, on December 18, 2014, the United States Department of the Treasury (the "Government"), by its attorney, Preet Bharara, United States Attorney for the Southern District of New York, filed a complaint against defendant Thomas E. Haider ("Defendant"), the former Chief Compliance Officer of MoneyGram International, Inc., under the Currency and Foreign Transactions Reporting Act of 1970, as amended, 31 U.S.C. § 5311 *et seq.*, which is commonly referred to as the Bank Secrecy Act, and its implementing regulations;

WHEREAS, on January 29, 2015, Defendant filed a motion to transfer this case to the United States District Court for the District of Minnesota pursuant to 28 U.S.C. § 1404(a);

WHEREAS, the parties agree that venue is proper in the District of Minnesota under 28 U.S.C. § 1391(b)(2), and that there is personal jurisdiction over Defendant in the District of Minnesota;

WHEREAS, based on the facts and circumstances of this case, the Government has agreed to the transfer of this case to the District of Minnesota;

NOW, THEREFORE, IT IS STIPULATED AND AGREED, by and between counsel for the Government and Defendant that:

1. Defendant's Motion to Transfer Venue shall be denied as moot.
2. This case shall be transferred, pursuant to 28 U.S.C. § 1404(a), to the United States District Court for the District of Minnesota.
3. Following the transfer of this case to the District of Minnesota, Defendant agrees not to raise any further challenges to the Government's complaint based on improper venue or lack of personal jurisdiction.
4. This Stipulation and Order to Transfer Venue shall not be construed as addressing the merits of this action or any other issues besides venue and personal jurisdiction, as set forth above in paragraph 3.
5. By entering into this Stipulation and Order to Transfer Venue, the Government does not waive and specifically reserves its right to amend the complaint after this case is transferred to the District of Minnesota and following service of a responsive pleading or a motion under Rule 12(b), (e) or (f) of the Federal Rules of Civil Procedure.
6. The Government and Defendant agree that Defendant shall answer or otherwise respond to the Complaint either (1) within twenty days after the case is docketed in the District of Minnesota, or (2) Friday, April 17, 2015, whichever is later.
7. This Stipulation and Order to Transfer Venue contains the entire agreement between the Government and Defendant, and no statements, representations, promises, agreements, or negotiations, oral or otherwise, between the parties or their counsel that are not included herein shall be of any force or effect.

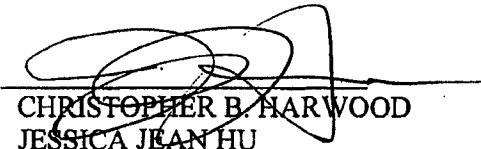
8. The parties agree that facsimiles, PDFs, or copies of signatures may be presented to the Court with the same force and effect as original signatures.


Dated: New York, New York
March 13, 2015

Dated: Philadelphia, Pennsylvania
March 13, 2015



PREET BHARARA
United States Attorney

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SO ORDERED:


HONORABLE J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE 

3/16/15